Exhibit O

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,	Civil Action No. 1:19-cv-12551-FDS
Plaintiff,	
v.	
GOOGLE LLC,	
Defendant.	

PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST SET OF REQUESTS FOR ADMISSION

Plaintiff, Singular Computing LLC ("Singular"), responds to Defendant, Google LLC's ("Google"), first set of requests for admission.

GENERAL OBJECTIONS

1.   Singular objects to these Requests for Admission to the extent they purport to impose obligations different from those set forth in Federal Rule of Civil Procedure 36 and applicable local rules.

2.   Singular objects to each request to the extent it calls for a legal conclusion. Singular's responses shall not be construed as providing legal conclusions concerning the meaning or application of any terms used in Google's requests for admissions.

3.   Singular's failure to object to any request for admission on a particular ground or grounds shall not be construed as a waiver of its right to object on any additional ground(s) consistent with further investigation and discovery.

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RESPONSES

REQUEST FOR ADMISSION NO. 1:

Admit that the first generation of Google's TPU, also known as SeaStar, is not accused of infringing the Patents-in-Suit.

RESPONSE:

Singular admits that the TPUv1 is not accused of infringing the Patents-in-Suit in this case. Otherwise, Singular specifically denies.

REQUEST FOR ADMISSION NO. 2:

Admit that the Patents-in-Suit do not encompass execution units using an 8-bit integer format.

RESPONSE:

Because the Court has not issued its claim construction ruling, Singular lacks sufficient information to admit or deny this request at this time, and therefore denies it.

REQUEST FOR ADMISSION NO. 3:

Admit that Dr. Joseph Bates represented to others that Stephen Boyd was an advisor to Singular.

RESPONSE:

Singular admits that in one or more of its documents, it prematurely indicated that it had an advisory board that included Stephen Boyd. Otherwise, Singular specifically denies.

REQUEST FOR ADMISSION NO. 4:

Admit that Singular has earned no revenue from the sale or license of the S1.

RESPONSE:

Specifically denies.

REQUEST FOR ADMISSION NO. 5:

Admit that Singular has never granted an outbound license for commercial use of any of

the Patents-in-Suit.

RESPONSE:

Specifically denies.

REQUEST FOR ADMISSION NO. 6:

Admit that Singular is not currently trying to commercialize the S1.

RESPONSE:

Specifically denies.

REQUEST FOR ADMISSION NO. 7:

Admit that the emulator code made available for inspection in this action is the same code

that Singular provided to BAE.

RESPONSE:

Singular admits that the emulator code made available for inspection in this action that

included the following Terms of Use:

> This file is Proprietary and Confidential information of Singular Computing LLC. It is being
> provided to BAE Systems according to and subject to the terms of Proprietary Information
> Agreement PIA NO. MER 15-050999-00 dated 25 Nov 2013 . . . It is not to be used for any
> other purpose.

is the same emulator code that Singular provided to BAE Systems.

REQUEST FOR ADMISSION NO. 8:

Admit that the asserted claims do not encompass execution units that perform only exact

mathematical calculations.

RESPONSE:

Because the Court has not issued its claim construction ruling, Singular lacks sufficient information to admit or deny this request at this time, and therefore denies it.

REQUEST FOR ADMISSION NO. 9:

Admit that Dr. Joseph Bates never disclosed to Google a 16-bit floating-point number format with an 8-bit exponent, 7-bit fraction, and single sign bit.

RESPONSE:

Specifically denies.

REQUEST FOR ADMISSION NO. 10:

Admit that the S1 chip uses a logarithmic number format.

RESPONSE:

Singular admits that the S1 chip uses many number formats including a logarithmic number format, among others.

REQUEST FOR ADMISSION NO. 11:

Admit that the S1 uses a 14-bit data type, of which 1 bit is a sign bit, 7 bits are for the exponent, and 6 bits are for the log of the mantissa.

RESPONSE:

Specifically denies.

Dated: June 23, 2021

Respectfully submitted,

/s/ Kevin Gannon

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ATTORNEYS FOR THE PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on June 23, 2021, I served this document on Defendant by causing a copy to be sent via electronic mail to its counsel of record.

/s/ Kevin Gannon